

IN THE EXECUTIVE ETHICS COMMISSION
OF THE STATE OF ILLINOIS

In re: KENNETH HANNAH,) OEIG Case # 10-00096

OEIG FINAL REPORT (REDACTED)

Below is a final summary report from an Executive Inspector General. The General Assembly has directed the Executive Ethics Commission (Commission) to redact information from this report that may reveal the identity of witnesses, complainants or informants and “any other information it believes should not be made public.” 5 ILCS 430/20-52(b).

The Commission exercises this responsibility with great caution and with the goal of balancing the sometimes competing interests of increasing transparency and operating with fairness to the accused. In order to balance these interests, the Commission may redact certain information contained in this report. The redactions are made with the understanding that the subject or subjects of the investigation have had no opportunity to rebut the report's factual allegations or legal conclusions before the Commission.

The Commission received a final report from the Governor's Office of Executive Inspector General ("OEIG") and a response from the agency in this matter. The Commission, pursuant to 5 ILCS 430/20-52, redacted the final report and mailed copies of the redacted version and responses to the Attorney General, the Governor's Executive Inspector General and to Kenneth Hannah at his last known address.

The Commission reviewed all suggestions received and makes this document available pursuant to 5 ILCS 430/20-52.

FINAL REPORT

I. Initial Allegation and Subsequent Allegations

The Office of Executive Inspector General (“OEIG”) received a complaint alleging that Illinois Department of Transportation (“IDOT”) employee Kenneth Hannah improperly works with trucking companies to prepare for surprise IDOT audits and to implement changes following those audits.¹

During the investigation, the OEIG discovered evidence that Mr. Hannah used his official position for personal gain, failed to disclose his secondary employment to IDOT, did not file an

¹ [This footnote contains allegations unrelated to the present matter and the Commission has determined pursuant to 5 ILCS 430/20-52(b) that it should be redacted.]

accurate 2010 Statement of Economic Interest, and did not accurately document his time. Mr. Hannah also interfered with the OEIG investigation.

II. Background

A. Kenneth Hannah's Present Duties and Responsibilities

Kenneth Hannah is an IDOT Grant Specialist. His duties and responsibilities include reviewing and approving IDOT Safe Route to School grants. These are federally subsidized grants that relate to developing programs that encourage schoolchildren to walk or bicycle to school. Many of the grants Mr. Hannah reviews and approves exceed \$5,000. Mr. Hannah's work hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday. Mr. Hannah reports to [employee 1] and [employee 2], both of whom work in the same building as Mr. Hannah.

B. Kenneth Hannah's Prior Duties and Responsibilities

Between October 1996 and July 2008, Mr. Hannah worked as an IDOT Motor Carrier Compliance Officer. In that position, his duties and responsibilities included auditing trucking companies for compliance with IDOT regulations and administering fines for violations.

C. Kenneth Hannah's Prior Misconduct

In July 2008, Mr. Hannah received a 12-month unpaid suspension for multiple findings of misconduct in OEIG case number 07-00108. Mr. Hannah returned to IDOT in July 2009 in his current position.

D. [The Company].

[Company] is a private company located in [redacted]. [Company] provides a variety of services relating to IDOT and U.S. Department of Transportation audits, including conducting mock safety and records audits for trucking companies in order to prepare the company for future regulatory examinations. Following a mock audit, [company] issues the trucking company a report detailing potential State or Federal violations and the necessary remedial action. [Company president] is a former Federal Motor Carrier Safety Investigator and is a friend of Mr. Hannah's. Mr. Hannah worked as an independent contractor for [company] from July 2008 to November 2010, at which time IDOT denied his request for secondary employment because it constituted a conflict of interest. Mr. Hannah was identified as a [company] employee on the company's website until November 2010.

E. [Trucking Company]

[Trucking company] is a private trucking company in [redacted] Illinois. [Trucking company's] primary operations relate to hauling grain, lumber, and steel between Midwestern states. [Trucking company] is subject to IDOT regulation and is annually audited by IDOT. [Vendor employee] is [trucking company's] Safety Director. Her duties and responsibilities include maintaining books and records relating to safety compliance and company finances.

[Vendor employee] also initiated contact with [company] in February 2009 to prepare for an IDOT inspection. Thereafter, Mr. Hannah conducted five mock audits.

III. Investigation

A. Mr. Hannah's Work With [Company]

i. Interview of [employee 3] Regarding Conduct Unbecoming

On July 20, 2010, OEIG investigators interviewed [employee 3]. During his interview, [employee 3] said that he knows Mr. Hannah because they previously worked together at IDOT. [Employee 3] said he was aware that Mr. Hannah was still working for IDOT and also privately working with trucking companies to implement changes both before and following IDOT audits. [Employee 3] recalled that in February 2010 while auditing [trucking company], he learned that [trucking company] hired Mr. Hannah to review its records before the IDOT audit. [Employee 3] noted that both during and after his official review of [trucking company], Mr. Hannah contacted him numerous times to determine the areas in which [trucking company] was deficient. [Employee 3] said that Mr. Hannah never asked that he ([employee 3]) alter the findings made against [trucking company].

ii. Interview of [vendor employee] Regarding Conduct Unbecoming

On September 8, 2010 and April 13, 2011, OEIG investigators interviewed [trucking company] employee [vendor employee]. During her interviews, [vendor employee] said that [trucking company's] insurance company recommended that she contact [company] owner [company president] to conduct a series of mock audits to prepare for IDOT review. [Vendor employee] explained that [company] sent Mr. Hannah to conduct five mock audits for [trucking company] between February 2009 and April 2010. [Vendor employee] recalled that throughout that time, Mr. Hannah referred to himself as a former IDOT auditor and advised that he knew people that could help [trucking company's] compliance rating. When asked if Mr. Hannah ever expressly stated that he could use his current position to help [trucking company] obtain a better compliance rating, [vendor employee] responded "no." [Vendor employee] explained that these mock audits occurred both before and after IDOT audited [trucking company]. [Vendor employee] noted that, following each mock audit, Mr. Hannah provided [trucking company] with a letter detailing necessary improvements. [Vendor employee] advised that [trucking company] paid Mr. Hannah between \$90 and \$130 per hour.

iii. Review of Invoices for Work Performed by Kenneth Hannah

OEIG investigators obtained and examined [company] invoices for work Kenneth Hannah performed for [trucking company] between September 25, 2009 and April 15, 2010. Each record included an itemized list of the tasks that Mr. Hannah completed for [trucking company] on [company's] behalf, including telephone calls and audit review.

iv. Interview of [company president] Regarding Conduct Unbecoming

On December 7, 2010, OEIG investigators interviewed [company president]. During the interview, [company president] said that Mr. Hannah works as an independent contractor for [company]. [Company president] explained that Mr. Hannah solicits business from trucking companies and performs mock audits for those companies for compliance with the Federal Motor Carrier Safety Regulations. [Company president] advised that Mr. Hannah charges approximately \$115 to \$120 per hour for his work and that [company] receives 20% of his fee.

v. *Interview of Kenneth Hannah Regarding Conduct Unbecoming*

On December 21, 2010, OEIG investigators interviewed Kenneth Hannah. During the interview, Mr. Hannah said that he joined [company] as an independent contractor in July 2008. Mr. Hannah advised that he continued to work at [company] after returning to State service in July 2009. Mr. Hannah noted that he conducts mock audits for trucking companies to prepare them for future IDOT review. Mr. Hannah said he charges trucking companies \$125 per hour for his services. Mr. Hannah explained that he obtains federal compliance scores from the website www.fmcsa.gov and contacts trucking companies with poor scores. Mr. Hannah said that he follows a uniform introduction when he solicits business from a trucking company in which he introduces himself as a current IDOT employee and states that he previously conducted trucking compliance audits for IDOT. Mr. Hannah explained that he then informs the trucking company representative that he can assist them in obtaining a better IDOT audit rating.

Mr. Hannah stated that he maintained friendships with numerous IDOT Motor Carrier Compliance Officers and that he occasionally telephones them. Mr. Hannah said he only discusses rules and regulations, which are also publicly available, and does not lobby IDOT employees to improve his clients' scores.

B. Failure to Disclose Secondary Employment

i. *Review of Documents Relating to Secondary Employment*

OEIG investigators obtained and examined documents relating to Kenneth Hannah's secondary employment. A review of these records revealed that Mr. Hannah filed a secondary employment disclosure form with IDOT on November 22, 2010 reflecting his work with [company]. On the form, Mr. Hannah described his work with [company] as follows:

I go to companies on my off time away from my full time job with IDOT and explain Commercial Motor Vehicle Safety and the rules that apply to them through public information obtained on Public Federal Web sites (sic): www.fmcsa.gov or www.saftersys.gov or www.csa2010.gov. I obtain this information on my off time away from IDOT and I do not obtain any private information from IDOT nor do I have any access to any private information that IDOT would have on any companies that I would be in contact with (sic). I DO NOT COMPETE WITH ANY IDOT DEPARTMENT SERVICES. I DO NOT REPRESENT ANY COMPANY THAT IS GOING THROUGH ANY TYPE OF COMPLIANCE SAFETY REVIEW OR ANY TYPE OF PENALTY PROCESS.
Emphasis original.

IDOT denied Mr. Hannah's request to continue work with [company] because it created a conflict of interest.

ii. Interview of Kenneth Hannah Regarding Secondary Employment

During his December 21, 2010 OEIG interview, Mr. Hannah said that he joined [company] as an independent contractor in July 2008 and continued working for [company] after he returned to State service in July 2009. Mr. Hannah stated that he disclosed his work with [company] to IDOT in November 2010 and IDOT disapproved his work with [company] as a conflict of interest. Mr. Hannah said that he stopped working for [company] after IDOT denied his secondary employment disclosure form.

C. Failure to File an Accurate Statement of Economic Interest

i. Review of Kenneth Hannah's Statement of Economic Interest

OEIG investigators obtained and reviewed Kenneth Hannah's 2010 Statement of Economic Interest, which reflected income earned in 2009. Mr. Hannah responded "N/A" to all of the required disclosures.

ii. Review of Kenneth Hannah's 2009 Income Tax Return

OEIG investigators obtained and examined copies of Mr. Hannah's 2009 federal income tax return and supporting documentation. Mr. Hannah received a 1099 form from [company] reflecting 2009 income. According to this form, [company] paid Mr. Hannah [redacted] in 2009.

iii. Interview of Kenneth Hannah Regarding Statement of Economic Interest

During his December 21, 2010 OEIG interview, Mr. Hannah said that he made approximately \$14,000 from his work with [company] in 2009. Investigators presented Mr. Hannah with his 2010 Statement of Economic Interest and asked why he did not disclose his income from his work with [company] on the form. In response, Mr. Hannah said that he believed the form only applied to income earned while employed at IDOT and he made less than \$5,000 from [company] during the months he was employed by IDOT in 2009.

D. Improper Timekeeping

i. Witness Interviews Regarding Timekeeping

OEIG investigators interviewed the following IDOT co-workers and supervisors of Mr. Hannah's regarding his timekeeping: [employee 2] on April 7, 2010; [employee 1] on August 3, 2010; and [employee 4] on August 3, 2010. During their interviews, each said that Mr. Hannah often makes personal calls on his personal cellular telephone during the workday. [Employee 4] also said that he overheard Mr. Hannah speaking on his personal cellular telephone with family members and various trucking companies during working hours.

ii. Review of Kenneth Hannah's Personal Cellular Telephone Records

OEIG investigators obtained and reviewed copies of Kenneth Hannah's personal cellular telephone records for dates between July 1, 2009 and April 30, 2010. According to these records, not including calls made to other IDOT employees or the company responsible for repair of IDOT copy machines, Mr. Hannah made 6,356 telephone calls, for a total of 269.35 hours, during time IDOT records reflect Mr. Hannah was conducting IDOT business.² This averages to over 90 minutes of personal telephone conversation per workday, or 20 percent of Mr. Hannah's scheduled working hours. The majority of these calls were made to trucking companies, financial institutions, credit agents, a pool supply company, and family members.

iii. Interview of Kenneth Hannah Regarding Timekeeping

During his December 21, 2010 OEIG interview, Mr. Hannah said that he uses his personal cellular telephone during the workday for both personal and IDOT business. Mr. Hannah estimated that over 70 percent of the calls he made on his personal cell phone related to maintenance work he performs on IDOT copying machines.³ Mr. Hannah also said that he contacts trucking companies during the workday to discuss audits he performs for [company].

iv. Investigative Activity Following Kenneth Hannah's Interview

On April 13, 2011, OEIG investigators interviewed [employee 2], who is in Mr. Hannah's chain of command. During the interview, [employee 2] said that Mr. Hannah had no reason related to his official duties to call trucking companies, mortgage lenders, credit agents, and family members from his personal cellular telephone during IDOT hours. [Employee 2] also said that Mr. Hannah's office is equipped with a telephone, which he should use to conduct any IDOT business.

E. Interference with the OEIG Investigation

During the investigation, OEIG investigators obtained invoices from [trucking company] reflecting 11.5 hours of [company] work Mr. Hannah performed on March 8 and 9, 2010. Mr. Hannah's IDOT timekeeping records indicated he worked 7.5 hours at IDOT on each of those days.⁴

i. Telephone Conversations with [company president]

On January 11, 2011, OEIG investigators contacted [company president] via telephone to request that he provide copies of invoices for work Mr. Hannah completed on March 8 and 9, 2010. The request led to a series of telephone exchanges, during which [company president]

² OEIG obtained and reviewed Mr. Hannah's IDOT timekeeping records in order to determine the hours he worked.

³ IDOT employee [employee 1] informed OEIG investigators that Mr. Hannah performs maintenance work on IDOT copying machines during working hours.

⁴ The OEIG investigation did not reveal sufficient evidence to determine that Mr. Hannah inaccurately reported his time on these dates.

stated that Mr. Hannah had called him saying that the invoices were inaccurate. [Company president] said he would provide the requested invoices but there might be a delay due to the “dilemma” with Mr. Hannah.

During a telephone conversation with [company president] later on January 11, 2011, [company president] said that Mr. Hannah had called him multiple times to ask if [company president] was going to provide the documents to the OEIG. [Company president] said that, because of his conversations with Mr. Hannah, he was reluctant to provide the OEIG with copies of the requested documents without a subpoena. [Company president] explained that he feared Mr. Hannah would sue [company].

ii. Interview of [company president] Regarding Interference with the OEIG Investigation

On February 18, 2011, OEIG investigators re-interviewed [company president]. During the interview, [company president] said that Mr. Hannah telephoned him to discuss [company] invoices for work he (Mr. Hannah) completed on March 8 and 9, 2010. [Company president] also said that Mr. Hannah’s telephone call was the first time he was made aware of any issues relating to the accuracy of the invoices. [Company president] stated that Mr. Hannah referenced the OEIG investigation and the invoices during this telephone call. According to [company president], Mr. Hannah directed him not to send the OEIG copies of the March 8 and 9, 2010 invoices because Mr. Hannah believed they were not accurate. [Company president] noted that Mr. Hannah also said that complying with the OEIG request could lead to a “legal action.” Mr. Hannah did not clarify whether this was a threat to sue [company]. [Company president] said that, because of his conversation with Mr. Hannah, he did not provide the documents to the OEIG. [Company president] also stated that he understood that Mr. Hannah would not want the OEIG to obtain the invoices because the documents could be damaging to him.

iii. Interview of Kenneth Hannah Regarding Interference with the OEIG Investigation

On February 22, 2011, OEIG investigators re-interviewed Kenneth Hannah. During the interview, Mr. Hannah said that he did not telephone [company president] following Mr. Hannah’s first OEIG interview. Mr. Hannah stated that he speaks with [company president] frequently because they are friends. Mr. Hannah also said that [company president] telephoned him every time he ([company president]) spoke with OEIG investigators. Mr. Hannah noted that [company president] contacted him following Mr. Hannah’s OEIG interview to discuss the [company] invoices for March 8 and 9, 2010 and they discussed [company president] not providing the OEIG with invoices. Mr. Hannah also said he would never threaten [company president] with legal action.

Investigators then reminded Mr. Hannah of his duty to cooperate with the OEIG investigation. Mr. Hannah said he understood this duty. Mr. Hannah reiterated that [company president] contacted him regarding the March 8 and 9, 2010 invoices. Investigators asked Mr. Hannah if he directed [company president] not to send the documents. In response, Mr. Hannah

said he did not recall. Mr. Hannah also said that [company president] brought up potential legal issues.

IV. Analysis

A. Kenneth Hannah Violated the IDOT Employee Conduct Policy

IDOT Personnel Policy 10-3(O) states that employees must promote a positive public image of the Department. This policy prohibits employees from engaging in conduct that could bring discredit to the Department.

Kenneth Hannah's work with [company] could bring discredit to the Department. IDOT audits motor carriers in Illinois to monitor compliance with safety regulations. If a company does not satisfy the various statutory requirements, IDOT Motor Carrier Compliance Officers have the authority to administer fines. Through his work with [company], Mr. Hannah solicited business from trucking companies and received money in exchange for conducting pre-emptive compliance reviews to improve audit scores and avoid administrative fines.

Kenneth Hannah personally profited by preparing companies subject to IDOT regulation for IDOT audits. During their OEIG interviews, Mr. Hannah and [company president] each stated that Mr. Hannah charged at least \$115 per hour to conduct trucking company mock audits. The purpose of these audits was to prepare the trucking companies for IDOT review. Although Mr. Hannah's present IDOT duties do not relate to trucking company regulation, Mr. Hannah's actions reflect poorly on the Department. From the perspective of the public, Mr. Hannah is an IDOT employee who is personally profiting from helping regulated companies prepare for audits performed by other IDOT employees. Although the investigation did not produce any evidence that Mr. Hannah used any connections he has within IDOT to ensure [trucking company] or any other trucking company received a positive audit, Mr. Hannah's actions could create the perception that his clients received inside information or other preferential treatment. Thus, the allegation that Mr. Hannah's work with [company] violates IDOT policy is **FOUNDED**.

B. Kenneth Hannah Violated the IDOT Employee Ethics Policy

IDOT Personnel Policy 10-3(H) states that employees may not use their official position for personal gain.

Kenneth Hannah used his IDOT position for personal gain. Mr. Hannah said that he contacts trucking companies to solicit business. Mr. Hannah stated that, during these conversations, he informed the trucking company representative that he is a current IDOT employee and that he can help the company obtain a favorable IDOT audit. Mr. Hannah thus used his status as an IDOT employee to earn credibility with potential clients regarding IDOT audits. Therefore, the allegation that Mr. Hannah's conduct violated the IDOT employee ethics policy by using his IDOT position for personal gain is **FOUNDED**.

C. Kenneth Hannah Violated the IDOT Secondary Employment Policy

IDOT Personnel Policy 15-4 states that an employee may hold outside employment after filing a Secondary Employment form with his supervisor.

Kenneth Hannah did not properly disclose his secondary employment. Mr. Hannah joined [company] in July 2008 and continued his employment after returning to State service in July 2009. However, Mr. Hannah did not disclose his secondary employment to IDOT until November 2010. As a result, Mr. Hannah maintained his outside employment with [company] without authorization for over a year. Therefore, the allegation that Mr. Hannah violated the IDOT secondary employment policy is **FOUNDED**.

D. Kenneth Hannah Violated the Illinois Governmental Ethics Act

The Illinois Governmental Ethics Act states that agency employees who have direct responsibility for the formation, negotiation, issuance, or execution of State contracts for more than \$5,000, must annually file a Statement of Economic Interest with the Illinois Secretary of State. 5 ILCS 420/4A-101(f)(1). These employees must disclose to the Secretary of State, among other interests, “the name of any entity and any position held therein from which income of in excess of \$1,200 was derived during the preceding calendar year, if the entity does business in the State of Illinois.” 5 ILCS 420/4A-102(b)(2). The willful filing of an incomplete or false Statement of Economic Interest is classified as a Class A misdemeanor. 5 ILCS 420/4A-107.

Kenneth Hannah filed an inaccurate 2010 Statement of Economic Interest. Mr. Hannah is responsible for approving Safe Route to School grants, which result in the expenditure of more than \$5,000 of State funds. Thus, Mr. Hannah must report any secondary income he earns over \$1,200 on his Statement of Economic Interest. Mr. Hannah’s tax records indicate that he earned more than \$18,000 for his work with [company] in 2009. Accordingly, Mr. Hannah was required to disclose his work with [company] to the Secretary of State. He did not do so. Mr. Hannah claims that he believed that he only had to consider income he received while a State employee. However, the Statement of Economic Interest form states that filing individuals must disclose sources of more than \$1,200 in income earned in the past calendar year, not just while in State employment. Thus, the allegation Mr. Hannah filed an inaccurate 2010 Statement of Economic Interest is **FOUNDED**.

E. Kenneth Hannah Violated the IDOT Timekeeping Policies

IDOT Personnel Policy 7-2(A) states that employees are expected to be at their work stations from their scheduled start time until their scheduled quitting time. This policy also states that “[e]mployees are required to accurately document their time worked.”

Kenneth Hannah reported time spent on personal phone calls as time spent on IDOT business. Between July 1, 2009 and April 30, 2010, Mr. Hannah spent over 269 hours, the equivalent of more than 35 workdays, on his personal cellular telephone on calls not identifiable as relating to IDOT business during hours he reported working for IDOT. The majority of these telephone calls were made to trucking companies with which Mr. Hannah worked while at [company], financial institutions, credit agents, a pool supply company, and family members. Mr. Hannah would have had no IDOT business reason to contact these entities. Moreover, Mr.

Hannah admitted to placing personal calls during IDOT time. Thus, the allegation that Mr. Hannah violated IDOT timekeeping policy is **FOUNDED**.

F. Kenneth Hannah Interfered with the OEIG Investigation

The State Officials and Employees Ethics Act requires every employee under the jurisdiction of the OEIG to cooperate in any OEIG investigation. 5 ILCS 430/20-70. Any person who “intentionally obstructs or interferes” with an OEIG investigation is subject to an administrative fine up to \$5,000. 5 ILCS 430/50-5(e).

Kenneth Hannah interfered with the OEIG investigation by directing [company president] not to comply with an OEIG request for documents. [Company president] initially agreed to comply with the OEIG request to provide copies of [company] invoices reflecting Mr. Hannah’s March 8 and 9, 2010 work. [Company president] and Mr. Hannah each informed investigators that, following the OEIG request, they spoke to one another regarding the invoices. Both noted that they discussed [company president] providing the OEIG documents and that doing so could result in a legal action. [Company president] stated that Mr. Hannah directed him not to provide the OEIG documents and said “legal action” could arise if [company president] complied. Mr. Hannah indicated that he did not recall whether he directed [company president] not to provide the invoices. Because of Mr. Hannah’s statements, [company president] was unwilling to provide the OEIG with copies of the invoices without a subpoena.

Mr. Hannah’s attempt to convince [company president] to withhold evidence from the OEIG caused an unnecessary delay in the investigation. The OEIG requested that [company president] provide documents to verify that the copies of invoices the OEIG obtained from [trucking company] were identical to the invoices [company] had on file. Even assuming that Mr. Hannah’s reason for wishing to prevent the OEIG from obtaining these invoices was that he believes they are inaccurate, Mr. Hannah was not justified in directing a witness to withhold evidence. Rather, Mr. Hannah should have informed the OEIG of his concerns regarding the accuracy of the invoices and allowed the OEIG to make its determination. In this case, the OEIG ultimately did not rely on these invoices because it could not confirm their accuracy. Nevertheless, Mr. Hannah’s conduct unnecessarily delayed the OEIG investigation. Therefore, the allegation that Mr. Hannah interfered with the OEIG investigation is **FOUNDED**.

V. Recommendations

Following due investigation, the OEIG issues the following findings:

- **FOUNDED** – Kenneth Hannah engaged in a conduct unbecoming of an IDOT employee.
- **FOUNDED** – Kenneth Hannah used his official position for personal gain.
- **FOUNDED** – Kenneth Hannah did not disclose his secondary employment.
- **FOUNDED** – Kenneth Hannah did not disclose his income from [company] on his 2010 Statement of Economic Interest.
- **FOUNDED** – Kenneth Hannah did not accurately document his time.
- **FOUNDED** – Kenneth Hannah interfered with the OEIG investigation.

The OEIG notes that it previously recommended that Mr. Hannah be discharged for multiple findings of misconduct, including abuse of State time, in OEIG case number 07-00108. Because of that recommendation, Mr. Hannah ultimately received a 12-month unpaid suspension. In light of this past discipline and the serious nature of the misconduct in this case, the OEIG recommends that Kenneth Hannah be discharged for his (1) conduct unbecoming of an IDOT employee; (2) use of his official position for personal gain; (3) failure to disclose his secondary employment; (4) failure to disclose his income from [company] on his 2010 Statement of Economic Interest; (5) failure to accurately document his time; and (6) interference with the OEIG investigation.

In addition, the OEIG will request that the Illinois Attorney General file a complaint against Kenneth Hannah with the Illinois Executive Ethics Commission alleging that he interfered with the OEIG investigation in Sections 20-70 and 50-5(e) of the Ethics Act.

No further investigation is required and this matter is considered closed.



Illinois Department of Transportation

Office of Quality Compliance & Review
201 West Center Court / Schaumburg, Illinois 60196-1096

July 11, 2011

Mr. Neil Olson
Deputy Director
Office of Executive Inspector General
607 East Adams, 14th Floor
Springfield, Illinois 62701-1634

Dear Mr. Olson:

This letter is in response to your June 3, 2011 letter regarding case number 10-00096 in which you requested that we inform your office of the actions taken to address your recommendation that Mr. Hannah be discharged from service. In accordance with your recommendation Mr. Hannah was discharged effective the close of business of July 8, 2011.

If you have any questions, or if I can be of further assistance to you or your staff, please do not hesitate to contact me at

Respectfully,

Daniel J. Kennelly
Director

cc: Acting Secretary Ann Schneider
Chief Counsel Ellen Schanzle-Haskins
Ethics Officer Robert Anderson